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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re:

GIGA WATT, Inc., a Washington
corporation,
Debtor.

Case No. 18-03197-FPC

The Honorable Frederick P. Corbit

Chapter 7

**DECLARATION OF PAMELA M.
EGAN IN SUPPORT OF
CHAPTER 7 TRUSTEE'S
MOTION FOR ORDER
APPROVING SETTLEMENTS**

I, Pamela M. Egan, pursuant to 28 U.S.C. § 1746 hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent
to make this Declaration.

2. I submit this declaration in support of the *Chapter 7 Trustee's Motion
for Order Approving Settlements* ("Motion"). Unless otherwise defined herein,
capitalized terms have the meanings ascribed to them in the Memorandum filed in
support of the Motion.

EGAN DECL. IN SUPP. OF
CHAPTER 7 TRUSTEE'S MOTION
FOR ORDER APPROVING SETTLEMENTS – Page 1

3. Exhibit 1 is a true and correct copy of the settlement agreement that the Trustee negotiated with Perkins Coie LLP and Lowell Ness.

4. Exhibits 1.2, 1.2.A, and 1.2.B are true and correct copies of the stipulation that the Trustee negotiated with Refael Sofair.

5. Exhibits 2 and 2.A are true and correct copies of the stipulation that the Trustee negotiated with Timur Usmanov.

6. Exhibits 1.1 and Exhibit 1.1.A through 1.1.F are true and correct copies of the drafts provided to me of the settlement agreement between Perkins and Mr. Dam and/or Mr. Blomquist.

7. Exhibits 3 through 9 and Exhibits 11 through 12 submitted with the Motion are true and correct copies of the Debtor's books and records.

8. Exhibit 10 is a true and correct copy of the testimony and statement provided by Perkins Coie LLP and Lowell Ness to the House Committee on Agriculture, 115th Congress on July 18, 2018, as published by the U.S. Government Publishing Office.

9. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of August 2023 in Seattle, Washington.

s/ Pamela M. Egan
Pamela M. Egan

EGAN DECL. IN SUPP. OF
CHAPTER 7 TRUSTEE'S MOTION
FOR ORDER APPROVING SETTLEMENTS – Page 2